



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

January 26, 2021

**BY CM/ECF**

The Hon. J. Paul Oetken  
United States District Court for the  
Southern District of New York  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, New York 10007

**Re: *United States v. Segovia-Landa et al.*, 20 Cr. 287 (JPO)**

Dear Judge Oetken:

The Government writes to respectfully request a 30-day adjournment of the conference scheduled for January 27, 2021 in the above-referenced matter, and to request an order excluding time under the Speedy Trial Act until the new date for the conference. The defendants each consent to this request.

On February 11, 2020, the defendants were arrested following a series of narcotics transactions. On February 12, 2020, the defendants were charged in a Complaint with one count of conspiracy to distribute heroin, fentanyl, and methamphetamine, in violation of 21 U.S.C. §§ 841(b)(1)(A) and 846. Following presentments held on the same day, defendants Marco Segovia-Landa, Ledif Perez-Perez, and Jose Rivera were ordered detained. Defendant Lisandy Joaquin Ortiz was released subject to bail conditions. On June 3, 2020, the grand jury returned Indictment 20 Cr. 287 charging each defendant with one count of conspiracy to distribute heroin, fentanyl, methamphetamine, and cocaine, in violation of 21 U.S.C. §§ 841(b)(1)(A) and 846.

Since the defendants were arrested, the Government has been engaged with various defendants regarding pretrial resolutions of their cases. Furthermore, discovery has been produced, the defendants have filed certain pretrial motions, and the Government's response is due February 5, 2021. *See* Dkt. Nos. 57, 63-65.

The Government seeks a 30-day adjournment of the pretrial conference in this matter. The parties are continuing their discussions regarding a pretrial resolution of this matter, which, in some cases, has been delayed due to restrictions on movement and communications for defendants being held in federal facilities.

The Government further requests an order excluding time under the Speedy Trial Act from January 27, 2021, until the new date for the pretrial conference. The ends of justice served by holding the conference at a future date outweigh the best interests of the public and the defendant in a speedy trial because it will permit the defendants additional time to review discovery under

<sup>1</sup> Although time is currently excluded under the Speedy Trial Act because pretrial motions have been filed, *see* 18 U.S.C. § 3161(h)(1)(d), the Government also seeks an exclusion of time for the reasons set forth above in the event that the pending pretrial motions have been resolved prior to the next conference.